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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA
VIVAS CASTILLO, A.C.A., SHERIKA BLANC,
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-1766-EMC

**DECLARATION OF G.S. IN SUPPORT OF
PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION TO
PROCEED UNDER PSEUDONYM**

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DECLARATION OF G.S.

I, G.S., declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I am writing this declaration to explain the reasons that I wish to proceed anonymously. I would prefer to use my complete name, but unfortunately, the recent actions of the government cause me to fear that I could be detained, deported, or face other harms if I participate in this lawsuit publicly. I know that the U.S. government is trying to deport Mahmoud Khalil because he protested against the war in Gaza. Other immigrants with visas or pending legal status are also being detained despite having no criminal history. From what I am reading in the newspapers, and seeing in the media, it seems like people are being targeting in part because they are seen as speaking out against the government's actions, even if they have valid reason to do so. I am afraid that the government will view my participation in this lawsuit as a reason to detain me, take away my TPS status, deprive me of any other legal status, and remove me from the country.

3. The state in which I reside, Massachusetts, has recently been in the news because of increased immigration enforcement at a national level. I read that Trump's border czar, Tom Homan, said that he was coming to Boston and "bringing hell" with him. I also read that Mr. Homan recently said that he "doesn't care" what judges think. These statements add to my fear of being targeted if my name is publicly associated with a lawsuit against the government, even if such retaliation is illegal.

4. Haitian immigrants in particular have repeatedly been the target of hateful, racist attacks by the highest-ranking government officials of the United States. I could hardly believe what President Trump, Vice President Vance, and others said about Haitian immigrants eating people's pet cats and dogs. This is obviously a lie; and they seem to know that it's a lie, with serious consequences for Haitians living here, but they say it anyway. I do not trust that the government, which has spread harmful lies and acted so recklessly with regard to the safety of the Haitian community, will respect my right to free

1 speech.

2 5. I am also afraid of harassment or abuse from individuals who do not want
3 Haitian immigrants to live in the United States. Unfortunately, I believe that the anti-
4 immigrant, anti-Haitian rhetoric of government officials has created an environment in
5 which it is not safe to disclose my immigration status publicly or to speak out for what I
6 believe is right, even though I would wish to do so. For all these reasons, I respectfully
7 request permission to proceed as a plaintiff under pseudonym.

8 I declare under penalty of perjury that the foregoing is true and correct, and that this
9 declaration was executed in Massachusetts this 19 day of March, 2025.

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